

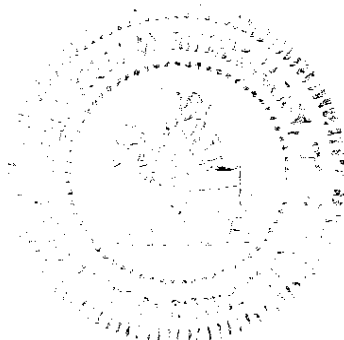
RICHARD GOOD

VS. NOBLE ENERGY, INC.

LINE DATE ACTION

1 01/05/16 TO CLERK FROM BORDAS & BORDAS, PLLC \$240.00 (CHECK) FILING FEE &
2 CERTIFIED MAIL/RETURN RECEIPT/RESTRICTED DELIVERY FEES (X2);
3 01/05/16 CCIS/CIVIL CASES FILED;
4 01/05/16 COMPLAINT, FILED;
5 01/05/16 SUMMONS/COMPLAINT (X6) TO WV SECRETARY OF STATE FOR SERVICE & RETU
6 -RN TO THE FOLLOWING: NOBLE ENERGY INC C/O CT CORP SYSTEM & TO
7 WHIPSTOCK NATURAL GAS SERVICES, LLC; SUMMONS/COMPLAINT BY CERT. MAI
8 -L/RETURN RECEIPT/RESTRICTED DELIV TO THE FOLLOWING: NOBLE ENERGY
9 , INC C/O CT CORP., SYSTEM & TO WHIPSTOCK NATURAL GAS SERVICES, LC;
10 01/14/16 WV SECRETARY OF STATE ACCEPTED SERVICE ON BEHALF OF WHIPSTOCK NA
11 -TURAL GAS SERVICES, LLC AT ADDRESS OF 5400 D BIG TYLER RD., CHARL
12 -ESTON, WV; INDICATING SERVICE ON 1/8/2016;
13 01/14/16 WV SECRETARY OF STATE ACCEPTED SERVICE ON BEHALF OF NOBLE ENERGY
14 , INC AT ADDRESS OF 5400 D BIG TYLER RD., CHARLESTON, WV; INDICATING
15 SERVICE ON 1/8/2016;
16 01/15/16 GREEN CARD FOR CERTIFIED MAIL TO NOBLE ENERGY, INC RETURNED TO
17 CIRCUIT CLERK'S OFFICE SIGNED BY ?D. HARPER? ON JANUARY 8, 2016
18 01/15/16 GREEN CARD FOR CERTIFIED MAIL TO WHIPSTOCK NATURAL GAS SERVICES,
19 LLC RETURNED TO CIRCUIT CLERK'S OFFICE SIGNED BY ?D. HARPER? ON
20 JANUARY 8, 2016

ATTEST COPY
Rene J. Allen
RITCHIE COUNTY CIRCUIT CLERK



Office of the Secretary of State
Building 1 Suite 157-K
1900 Kanawha Blvd E.
Charleston, WV 25305



Natalie E. Tennant
Secretary Of State
State Of West Virginia
Phone: 304-558-6000
866-767-8683
Visit us online:
www.wvsos.com

Rose Ellen Cox
Ritchie Co. Courthouse, Rm.301
115 East Main Street
Harrisville, WV 26362-1271

2016 JAN 14 A 9:41

Control Number: 87398

Defendant: NOBLE ENERGY, INC.
5400 D Big Tyler Road
CHARLESTON, WV 25313 US

Agent: C. T. Corporation System

County: Ritchie

Civil Action: 16-C-2

Certified Number: 92148901125134100000929304

Service Date: 1/8/2016

I am enclosing:

1 summons and complaint

which was served on the Secretary at the State Capitol as your statutory attorney-in-fact. According to law, I have accepted service of process in the name and on behalf of your corporation.

Please note that this office has no connection whatsoever with the enclosed documents other than to accept service of process in the name and on behalf of your corporation as your attorney-in-fact. Please address any questions about this document directly to the court or the plaintiff's attorney, shown in the enclosed paper, not to the Secretary of State's office.

Sincerely,

A handwritten signature in cursive script that reads "Natalie E. Tennant".

Natalie E. Tennant
Secretary of State

SUMMONS

IN THE CIRCUIT COURT OF RITCHIE COUNTY, WEST VIRGINIA

RICHARD GOOD, et al
PLAINTIFFS,

VS.

CASE NO. 16-C-2

WHIPSTOCK NATURAL GAS, et al,
DEFENDANTS.

SUMMONS

Serve On: NOBLE ENERGY, INC.
c/o CT CORPORATION SYSTEM
5400 D BIG TYLER ROAD
CHARLESTON, WV 25313

To the above-named Defendant:

IN THE NAME OF THE STATE OF WEST VIRGINIA, you are hereby Summoned and required to serve upon Geoffrey C. Brown, Plaintiff's Attorney, whose address is 1358 National Road, Wheeling, WV 26003, an answer including any related counterclaim you may have to the Complaint filed against you in the above styled civil action, a true copy of which is herewith delivered to you. You are required to serve your answer within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the Complaint and you will be thereafter barred

must be

West Virginia Secretary of State
Invoice #297634
Date: 1/7/2016
BORDAS & BORDAS PLLC

Service	Qty	Sub
Service - US defendant	2	\$40.00
16-C-2		
Total		\$40.00

Payment type	Amount
Check	\$40.00
Total	\$40.00



IN THE CIRCUIT COURT OF
RITCHIE COUNTY, WEST VIRGINIA

RICHARD GOOD
125 BEAVER ST.
WARSAW, OH 43844

AND

KAREN GOOD
125 BEAVER ST.
WARSAW, OH 43844

PLAINTIFFS,

v.

WHIPSTOCK NATURAL GAS
SERVICES, LLC
13646 ROUTE 403 NORTH
CLYMER PA 15728

AND

SERVE ALSO:
WHIPSTOCK NATURAL GAS
SERVICES, LLC
C/O CAROLYN TONKIN, PRESIDENT
13646 ROUTE 403 NORTH
CLYMER PA 15728

AND

NOBLE ENERGY, INC.
1001 NOBLE ENERGY WAY
HOUSTON, TEXAS 77070

AND

SERVE ALSO:

CASE NO:

16-C-2

JUDGE

COMPLAINT

JURY DEMAND ENDORSED HEREON

2016 JAN -5 P 1:16

FILED

NOBLE ENERGY, INC.
 CT CORPORATION SYSTEM
 5400 D BIG TYLER ROAD
 CHARLESTON, WV 25313

AND

NOBLE ENERGY, INC.
 C/O DAVID L. STOVER, PRESIDENT
 1001 NOBLE ENERGY WAY
 HOUSTON, TX 77070

AND

NOBLE ENERGY, INC.
 THE CORPORATION TRUST COMPANY
 CORPORATION TRUST CENTER
 1209 ORANGE STREET
 WILMINGTON, DE 19801

Now come Plaintiffs, Richard A. Good and Karen Good, who for their Complaint against the Defendants, Whipstock Natural Gas Services, LLC and Noble Energy, Inc., state as follows:

COUNT I

1. The Plaintiffs, Richard A. and Karen Good, are residents of Coshocton County, Ohio.
2. The Defendant, Whipstock Natural Gas Services, LLC ("Whipstock"), is organized in the State of Delaware, headquartered in Clymer, Pennsylvania, and conducts ongoing and substantial business operations in West Virginia, Pennsylvania and Ohio.
3. The Defendant, Noble Energy, Inc., is organized in the State of Delaware, headquartered in Houston, Texas, and conducts ongoing and substantial business operations in West Virginia and elsewhere.
4. At all times relevant hereto, Defendants, Noble Energy, Inc., Whipstock Natural Gas Services, LLC, and/or their employees/agents are persons, and/or entities, including but not limited

ATTEST COPY
Rene J. Miller, Clerk
 RITCHIE COUNTY CIRCUIT CLERK

Office of the Secretary of State
Building 1 Suite 157-K
1900 Kanawha Blvd E.
Charleston, WV 25305



Natalie E. Tennant
Secretary Of State
State Of West Virginia
Phone: 304-558-6000
866-767-8683
Visit us online:
www.wvsos.com

Rose Ellen Cox
Ritchie Co. Courthouse, Rm.301
115 East Main Street
Harrisville, WV 26362-1271

2016 JAN 14 A 9:40

Control Number: 87400

Defendant: WHIPSTOCK NATURAL GAS
SERVICES, L.L.C.
5400 D Big Tyler Road
CHARLESTON, WV 25313 US

Agent: C. T. Corporation System

County: Ritchie

Civil Action: 16-C-2

Certified Number: 92148901125134100000929311

Service Date: 1/8/2016

I am enclosing:

1 summons and complaint

which was served on the Secretary at the State Capitol as your statutory attorney-in-fact. According to law, I have accepted service of process in your name and on your behalf.

Please note that this office has no connection whatsoever with the enclosed documents other than to accept service of process in your name and on your behalf as your attorney-in-fact. Please address any questions about this document directly to the court or the plaintiff's attorney, shown in the enclosed paper, not to the Secretary of State's office.

Sincerely,

A handwritten signature in cursive script that reads "Natalie E. Tennant".

Natalie E. Tennant
Secretary of State

SUMMONS

IN THE CIRCUIT COURT OF RITCHIE COUNTY, WEST VIRGINIA

RICHARD GOOD, et al
PLAINTIFFS,

VS.

CASE NO. 16-C-2

WHIPSTOCK NATURAL GAS, et al,
DEFENDANTS.

SUMMONS

Serve On: WHIPSTOCK NATURAL GAS SERVICES,
LLC.
C/o CT CORPORATION SYSTEM
5400 D BIG TYLER ROAD
CHARLESTON, WV 25313

To the above-named Defendant:

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Dated this 5th day of January, 2016.
CLERK OF THE CIRCUIT COURT OF
RITCHIE COUNTY, WEST VIRGINIA

IN THE CIRCUIT COURT OF
RITCHIE COUNTY, WEST VIRGINIA

RICHARD GOOD
125 BEAVER ST.
WARSAW, OH 43844

AND

KAREN GOOD
125 BEAVER ST.
WARSAW, OH 43844

PLAINTIFFS,

v.

WHIPSTOCK NATURAL GAS
SERVICES, LLC
13646 ROUTE 403 NORTH
CLYMER PA 15728

AND

SERVE ALSO:
WHIPSTOCK NATURAL GAS
SERVICES, LLC
C/O CAROLYN TONKIN, PRESIDENT
13646 ROUTE 403 NORTH
CLYMER PA 15728

AND

NOBLE ENERGY, INC.
1001 NOBLE ENERGY WAY
HOUSTON, TEXAS 77070

AND

SERVE ALSO:

CASE NO:

16-C-2

JUDGE

COMPLAINT

JURY DEMAND ENDORSED HEREON

FILED
2016 JAN -5 P 1:17

NOBLE ENERGY, INC.
 CT CORPORATION SYSTEM
 5400 D BIG TYLER ROAD
 CHARLESTON, WV 25313

AND

NOBLE ENERGY, INC.
 C/O DAVID L. STOVER, PRESIDENT
 1001 NOBLE ENERGY WAY
 HOUSTON, TX 77070

AND

NOBLE ENERGY, INC.
 THE CORPORATION TRUST COMPANY
 CORPORATION TRUST CENTER
 1209 ORANGE STREET
 WILMINGTON, DE 19801

Now come Plaintiffs, Richard A. Good and Karen Good, who for their Complaint against the Defendants, Whipstock Natural Gas Services, LLC and Noble Energy, Inc., state as follows:

COUNT I

1. The Plaintiffs, Richard A. and Karen Good, are residents of Coshocton County, Ohio.
2. The Defendant, Whipstock Natural Gas Services, LLC ("Whipstock"), is organized in the State of Delaware, headquartered in Clymer, Pennsylvania, and conducts ongoing and substantial business operations in West Virginia, Pennsylvania and Ohio.
3. The Defendant, Noble Energy, Inc., is organized in the State of Delaware, headquartered in Houston, Texas, and conducts ongoing and substantial business operations in West Virginia and elsewhere.
4. At all times relevant hereto, Defendants, Noble Energy, Inc., Whipstock Natural Gas Services, LLC, and/or their employees/agents are persons, and/or entities, including but not limited

ATTEST COPY

Ritchie L. Allen
 RITCHIE COUNTY CIRCUIT CLERK

2016 JAN 15 A 9:33

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 		<p>A. Signature <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	
<p>1. Article Addressed to: <u>16-C-2</u></p> <p>NOBLE ENERGY, INC. c/o CT CORPORATION SYSTEM 5400 D BIG TYLER ROAD CHARLESTON, WV 25313</p>		<p>B. Received by (Printed Name)</p> <p>C. Date of Delivery</p>	
<p>2. Article Number (Transfer from service label)</p> <p>RESTRICTED DELIVERY</p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	
<p>PS Form 3811, July 2013</p>		<p>3. Service Type <input type="checkbox"/> Priority Mail Express™ <input type="checkbox"/> Registered <input type="checkbox"/> Insured Mail <input type="checkbox"/> Collect on Delivery</p>	
<p>7012 3050 0000 2340 1655</p>		<p>Domestic Return Receipt</p>	

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 		<p>A. Signature <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	
<p>1. Article Addressed to: <u>16-C-2</u></p> <p>WHIPSTOCK NATURAL GAS SERVICES, LLC. c/o CT CORPORATION SYSTEM 5400 D BIG TYLER ROAD CHARLESTON, WV 25313</p>		<p>B. Received by (Printed Name)</p> <p>C. Date of Delivery</p>	
<p>2. Article Number (Transfer from service label)</p> <p>RESTRICTED DELIVERY</p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	
<p>PS Form 3811, July 2013</p>		<p>3. Service Type <input type="checkbox"/> Priority Mail Express™ <input type="checkbox"/> Registered <input type="checkbox"/> Insured Mail <input type="checkbox"/> Collect on Delivery</p>	
<p>7012 3050 0000 2340 1648</p>		<p>Domestic Return Receipt</p>	

English

Customer Service

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Have questions? We're here to help.Get Easy Tracking Updates ›
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Tracking Number: 7012305000023401655

Noble Energy, Inc

On Time

Expected Delivery Day: Friday, January 8, 2016

Product & Tracking Information

Postal Product:
First-Class Mail®

Features:

Certified Mail Restricted Delivery Return Receipt

DATE & TIME	STATUS OF ITEM	LOCATION
January 8, 2016 , 12:52 pm	Delivered	CHARLESTON, WV 25313

Available Actions

Text Updates

Email Updates

Your item was delivered at 12:52 pm on January 8, 2016 in CHARLESTON, WV 25313.

January 8, 2016 , 8:56 am	Out for Delivery	CHARLESTON, WV 25313
January 8, 2016 , 7:53 am	Sorting Complete	CHARLESTON, WV 25313
January 8, 2016 , 7:46 am	Arrived at Unit	CHARLESTON, WV 25313
January 8, 2016 , 3:24 am	Departed USPS Facility	CHARLESTON, WV 25350
January 6, 2016 , 9:58 pm	Arrived at USPS Facility	CHARLESTON, WV 25350
January 6, 2016 , 4:06 pm	Departed Post Office	HARRISVILLE, WV 26362
January 6, 2016 , 3:17 pm	Acceptance	HARRISVILLE, WV 26362

Track Another Package

Tracking (or receipt) number

7012305000023401655

Track It

Manage Incoming Packages

Track all your packages from a dashboard.
No tracking numbers necessary.

Sign up for My USPS ›



English

Customer Service

USPS Mobile

Register / Sign In



USPS Tracking®

Customer Service ›
Have questions? We're here to help.Get Easy Tracking Updates ›
Sign up for My USPS.

Tracking Number: 7012305000023401648

Whipstock Natural Gas Services, LLC

On Time

Expected Delivery Day: Friday, January 8, 2016

Product & Tracking Information

Postal Product:
First-Class Mail®Features:
Certified Mail Restricted Delivery Return Receipt

Available Actions

Text Updates

Email Updates

DATE & TIME	STATUS OF ITEM	LOCATION
January 8, 2016, 12:52 pm	Delivered	CHARLESTON, WV 25313

Your item was delivered at 12:52 pm on January 8, 2016 in CHARLESTON, WV 25313.

January 8, 2016, 8:56 am	Out for Delivery	CHARLESTON, WV 25313
January 8, 2016, 7:53 am	Sorting Complete	CHARLESTON, WV 25313
January 8, 2016, 7:47 am	Arrived at Unit	CHARLESTON, WV 25313
January 8, 2016, 3:24 am	Departed USPS Facility	CHARLESTON, WV 25350
January 8, 2016, 8:58 pm	Arrived at USPS Facility	CHARLESTON, WV 25350
January 8, 2016, 4:08 pm	Departed Post Office	HARRISVILLE, WV 26362
January 8, 2016, 3:17 pm	Acceptance	HARRISVILLE, WV 26362

Track Another Package

Tracking (or receipt) number

7012305000023401648

Track It

Manage Incoming Packages

Track all your packages from a dashboard.
No tracking numbers necessary.

Sign up for My USPS ›



IN THE CIRCUIT COURT OF
RITCHIE COUNTY, WEST VIRGINIA

RICHARD GOOD
125 BEAVER ST.
WARSAW, OH 43844

AND

KAREN GOOD
125 BEAVER ST.
WARSAW, OH 43844

PLAINTIFFS,

v.

WHIPSTOCK NATURAL GAS
SERVICES, LLC
13646 ROUTE 403 NORTH
CLYMER PA 15728

AND

SERVE ALSO:
WHIPSTOCK NATURAL GAS
SERVICES, LLC
C/O CAROLYN TONKIN, PRESIDENT
13646 ROUTE 403 NORTH
CLYMER PA 15728

AND

NOBLE ENERGY, INC.
1001 NOBLE ENERGY WAY
HOUSTON, TEXAS 77070

AND

SERVE ALSO:

CASE NO: 16-C-2

JUDGE

COMPLAINT

JURY DEMAND ENDORSED HEREON

FILED

2016 JAN -5 P 1:16

CLERK
RITCHIE COUNTY
WEST VIRGINIA

NOBLE ENERGY, INC.)
 CT CORPORATION SYSTEM)
 5400 D BIG TYLER ROAD)
 CHARLESTON, WV 25313)

AND)

NOBLE ENERGY, INC.)
 C/O DAVID L. STOVER, PRESIDENT)
 1001 NOBLE ENERGY WAY)
 HOUSTON, TX 77070)

AND)

NOBLE ENERGY, INC.)
 THE CORPORATION TRUST COMPANY)
 CORPORATION TRUST CENTER)
 1209 ORANGE STREET)
 WILMINGTON, DE 19801)

Now come Plaintiffs, Richard A. Good and Karen Good, who for their Complaint against the Defendants, Whipstock Natural Gas Services, LLC and Noble Energy, Inc., state as follows:

COUNT I

1. The Plaintiffs, Richard A. and Karen Good, are residents of Coshocton County, Ohio.
2. The Defendant, Whipstock Natural Gas Services, LLC ("Whipstock"), is organized in the State of Delaware, headquartered in Clymer, Pennsylvania, and conducts ongoing and substantial business operations in West Virginia, Pennsylvania and Ohio.
3. The Defendant, Noble Energy, Inc., is organized in the State of Delaware, headquartered in Houston, Texas, and conducts ongoing and substantial business operations in West Virginia and elsewhere.
4. At all times relevant hereto, Defendants, Noble, Energy, Inc., Whipstock Natural Gas Services, LLC, and/or their employees/agents are persons, and/or entities, including but not limited

to, employees, agents, and/or representatives who owned, operated, controlled, and/or maintained the drilling site located near Bond Creek Rd. and Rock Rd. at Well PENS-2L-H, in the City of Pennsboro, Ritchie County, West Virginia.

5. At all times relevant herein, Defendants, Noble Energy, Inc., Whipstock Natural Gas Services, LLC, and/or their employees/agents were in possession and control of the site located near Bond Creek Rd. and Rock Rd at Well PENS-2L-H, in the City of Pennsboro, Ritchie County, West Virginia and/or employees of Defendants Noble Energy, Inc. and/or Whipstock Natural Gas Services, LLC. Further, Defendants had control of and were in charge of the care and maintenance of, and drilling operations at, the aforementioned property.

6. At all times relevant, an individual known as "Bill" was a rig-hand at the well/drilling site at issue, Well PENS-2L-H, acting in the employ/agency and at the direction of Defendants Whipstock Natural Gas Services, LLC, and/or Noble Energy, Inc.

7. At all times relevant, and individual known as "Mike" was the driller at the well/drilling site at issue, Well PENS-2L-H, acting in the employ/agency and at the direction of Defendants Whipstock Natural Gas Services, LLC, and/or Noble Energy, Inc.

8. At all times relevant, an individual known as "Eric" was the on-site safety officer acting in the employ/agency and at the direction of Defendants Noble Energy, Inc. and/or Whipstock Natural Gas Services, LLC.

9. On or about January 6, 2014, Plaintiff, Richard Good, was an invitee, contractor and/or frequenter at the premises located at the aforementioned address providing services for the benefit of Defendants at/near drilling operations at Well PENS-2L-H. While so doing, Plaintiff, Richard Good was struck in the head by a tong-head that came loose from winch-line attached to the drilling rig while "Mike" and "Bill" were performing operations including operating a winch on the

rig. Plaintiff suffered traumatic head injuries, bilateral subarachnoid hemorrhage, small right subdural hematoma, and intervertebral disc herniation, among other injuries.

10. Plaintiff, Richard Good, states that Defendants had knowledge of a dangerous environment.

11. Plaintiff further states that the Defendants owed a duty of reasonable care to Plaintiff, breached such duty and were actively negligent and/or reckless in the allowing and permitting a dangerous condition to exist with conscious disregard for the safety and rights of – and a great probability of substantial harm to – invitees, frequenters, and guests, specifically, Plaintiff, Richard Good, who was severely injured as a result of Defendants' active negligence.

12. Plaintiff states that the Defendants conduct referenced in the preceding paragraph includes, but is not limited to:

- failing to maintain drilling rig and all winches,
- utilizing the incorrect "spring-loaded" tong-head rather than a "lock-down" tong-head,
- failing to have rig-hand don harness and scale rig to ensure that tong-head/winch does not 'snag' on the rig,
- failing to follow appropriate procedures to clear area below winch,
- failing to warn workers including Plaintiff regarding operation of the winch,
- failing to appropriately operate winch, and
- failing to appropriately instruct/supervise drilling employees on site

13. As a direct and proximate result of the Defendants' conduct and in the failing to maintain a safe environment, Plaintiff, Richard Good, was caused to suffer severe and permanent injuries, suffered great pain of body and mind, a loss of enjoyment of life, lost time and income from

employment, suffered mental anguish, required medical care and treatment in the past, and will continue to suffer said losses in the future, all to his expense and obligation.

COUNT II

14. Plaintiffs reaver and reallege each and every allegation contained in Paragraphs 1 through 13, of Count I, the same, as if fully rewritten herein.

15. The individuals known as "Mike," "Bill," and "Eric," who were the employees/agents of Defendants Whipstock Natural Gas Services, LLC. and/or Noble Energy, Inc., negligently, and/or recklessly maintained and operated machinery or other equipment on January 6, 2014 with a great probability of substantial harm to Plaintiff.

16. Plaintiff states that the Defendants' conduct through "Mike," "Bill," and "Eric," referenced in the preceding paragraph, includes, but is not limited to:

- failing to maintain drilling rig and all winches,
- utilizing the incorrect "spring-loaded" tong-head rather than a "lock-down" tong-head,
- failing to have rig-hand don harness and scale rig to ensure that tong-head/winch does not 'snag' on the rig,
- failing to follow appropriate procedures to clear area below winch,
- failing to warn workers including Plaintiff regarding operation of the winch,
- failing to appropriately operate winch, and
- failing to appropriately instruct/supervise drilling employees on site

17. The individuals identified in Paragraph 15 were acting within the course and scope of their employment or agency with Defendant, Whipstock Natural Gas Services, LLC. and/or Noble Energy, Inc., and under the direction and control of Defendant, Whipstock Natural Gas Services,

LLC. and/or Noble Energy, Inc.

18. As a direct and proximate result of Defendant Whipstock Natural Gas Services, LLC, Noble Energy, Inc., and their employees'/agents' conduct, Plaintiff Richard Good was struck in the head by a tong-head. Plaintiff suffered traumatic head injuries, bilateral subarachnoid hemorrhage, small right subdural hematoma, and intervertebral disc herniation, among other injuries.

19. Defendants, Whipstock Natural Gas Services, LLC. and Noble Energy, Inc. are vicariously liable for the negligence of their employees/agents under the doctrine of *Respondeat Superior*.

COUNT III

20. Plaintiffs reaver and reallege each and every allegation contained in Paragraphs 1 through 19, of Count I and II, the same, as if fully rewritten herein.

21. Plaintiff Karen Good states that she is the wife of Plaintiff Richard Good and as a direct and proximate result of Defendants' negligence and the resulting injuries to Plaintiff Richard Good, she suffered a loss of her husband's care, comfort, services, and consortium in the past and will continue to suffer said losses in the future.

22. Plaintiff Karen Good further states that she is responsible for her husband's medical and hospital bills.

COUNT IV

23. Plaintiffs reaver and reallege each and every allegation contained in Paragraphs 1 through 22 of Count I, II, and II, the same as if fully rewritten herein.

24. Defendants' conduct referenced herein constituted a recklessness and/or a conscious disregard for the rights and safety of Plaintiff Richard A. Good and others similarly situated with a great probability of causing substantial harm.

WHEREFORE the Plaintiffs demand judgment against the Defendants, Whipstock Natural

Gas Services, LLC and Noble Energy, Inc., on Counts I-III in an amount that will fully and fairly compensate them for all damages caused by the conduct of the Defendants and for the costs, expenses and fees incurred in pursuit of this action and for all the relief to which they are entitled by law, including pre and post judgment interest and for any other relief deemed proper by the Court.

WHEREFORE the Plaintiffs demand judgment against the Defendants, Whipstock Natural Gas Services, LLC and Noble Energy, Inc. on Count IV for punitive damages in an amount sufficient to punish the Defendants and to deter them and others from the same or similar egregious conduct in the future.

A TRIAL BY JURY IS DEMANDED ON ALL ISSUES

Respectfully submitted,

GEOFFREY C. BROWN, ESQ
SCOTT S. BLASS #4628, ESQ
BORDAS & BORDAS, PLLC
1358 National Road
Wheeling, WV 26003
Telephone: (304) 242-8410
Counsel for Plaintiff

ATTEST COPY

Rae H. Newbold
RITCHIE COUNTY CIRCUIT CLERK

CIVIL CASE INFORMATION STATEMENT

CIVIL CASES

(Other than Domestic Relations)

In the Circuit Court, RITCHIE County, West Virginia

I. CASE STYLE:

Plaintiff(s)

RICHARD GOODKAREN GOODCase # 16-C-2Judge: Sweeney

2016 JAN -5 P 1:16

FILED

vs.

Defendant(s) NOBLE ENERGY, INC.,
c/o CT CORPORATION SYSTEM5400 D BIG TYLER ROAD**Street**CHARLESTON, WV 25313**City, State, Zip****Days to
Answer****Type of Service**20CERTIFIED MAILWHIPSTOCK NATURAL GAS SERVICES, LLC
c/o CT Corporation System5400 D BIG TYLER ROAD**Street**CHARLESTON, WV 25313**City, State, Zip**NOBLE ENERGY, INC.,c/o CT CORPORATION SYSTEM5400 D BIG TYLER ROAD**Street**CHARLESTON, WV 25313**City, State, Zip**20CERTIFIED MAIL20SECRETARY OF STATEWHIPSTOCK NATURAL GAS SERVICE, LLC5400 D BIG TYLER ROAD**Street**CHARLESTON, WV 25313**City, State, Zip**20SECRETARY OF STATEOriginal and 9 copies of complaint enclosed/attached.

PLAINTIFF: RICHARD A. GOOD, et al
 DEFENDANT: WHIPSTOCK NATURAL GAS SERVICES, LLC, et al

CASE NUMBER:

II. TYPE OF CASE:

- ☒ General Civil
- ☐ Mass Litigation
 (As defined in T.C.R. Rule XIX (c))
- ☐ Asbestos
- ☐ Carpal Tunnel Syndrome
- ☐ Diet Drugs
- ☐ Environmental
- ☐ Industrial Hearing Loss
- ☐ Silicone Implants
- ☐ Other: _____
- ☐ Adoption
- ☐ Administrative Agency Appeal
- ☐ Civil Appeal from Magistrate Court
- ☐ Miscellaneous Civil Petition
- ☐ Mental Hygiene
- ☐ Guardianship
- ☐ Medical Malpractice
- ☐ Habeas Corpus/Other Extraordinary Writ
- ☐ Other: _____

III. JURY DEMAND: ☒ Yes ☐ No

CASE WILL BE READY FOR TRIAL BY (MONTH/YEAR): 01, 2017

IV. DO YOU OR ANY OF YOUR CLIENTS OR WITNESSES IN THIS CASE REQUIRE SPECIAL ACCOMMODATIONS DUE TO A DISABILITY? ☐ YES ☒ NO

IF YES, PLEASE SPECIFY:

- ☐ Wheelchair accessible hearing room and other facilities
- ☐ Interpreter or other auxiliary aid for the hearing impaired
- ☐ Reader or other auxiliary aid for the visually impaired
- ☐ Spokesperson or other auxiliary aid for the speech impaired
- ☐ Other: _____

Attorney Name: GEOFFREY C. BROWN
 Firm: BORDAS & BORDAS, PLLC
 Address: 1358 NATIONAL ROAD, WHEELING, WV 26003
 Telephone: (304) 242-8410
 Dated: 01/05/2016

Representing:

- ☒ Plaintiff ☐ Defendant
- ☐ Cross-Complainant ☐ Cross-Defendant

Signature

☐ Proceeding Without an Attorney

ATTEST COPY

Rose E. New Cook

RITCHIE COUNTY CIRCUIT CLERK